

**C. REMARKS****Examiner Interview**

Applicant wishes to thank the Examiner and his supervisor for the courtesy extended to Applicant's attorney during the telephone interview of November 17, 2004.

**Drawings**

Applicant notes with appreciation the acceptance of Applicant's formal drawings by the Examiner in the Office Action.

**Amendments to the Specification**

The specification has been amended to correct an inadvertent typographical error, and also to add serial numbers and filing dates of the related applications.

**Status of the Claims**

Claims 1, 2, 5, 6, 8-11, 13, 14, 17, 18, and 20 have been amended. Claims 4 and 16 have been cancelled. Claims 1-3, 5-15, and 17-20 are currently present in the Application, and claims 1, 9, and 13 are independent claims.

Claims 1-3, 5, 8, 13-14, and 20 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Berson, U.S. Patent No. 5,598,477 (hereinafter Berson). Claims 4-6, 9-11, and 16-18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Berson in view of Sansone, U.S. Patent No. 6,454,174 (hereinafter Sansone). Claims 7 and 19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Berson and Sansone in view of Bruce Schneier's Applied Cryptography (hereinafter Schneier). Claim 12 also stands rejected under 35 U.S.C. §

103(a) as being unpatentable over Berson and Sansone in view of Schneier. Applicant respectfully traverses the rejections.

**Claim Rejections - Alleged Anticipation Under 35 U.S.C. § 102**

Claims 1-3, 5, 8, 13-14, and 20 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Berson. Applicant teaches and claims a method, system, and computer program product for processing tickets that include customer security features. Independent claims 1 and 13 (and similarly, independent claim 9) have been amended to clarify that customer security features are used to "identify a customer associated with the ticket." The use of security features to identify a particular customer is discussed in detail in Applicant's specification, including, e.g., on page 4, lines 2-10; page 9, lines 19-26; page 11, lines 12-14; and page 12, lines 16-19. Also note that independent claims 1 and 13 have been amended to include the limitations previously found in dependent claims 4 and 16, respectively. These elements are addressed more fully below with regard to the claim rejections under 35 U.S.C. § 103.

Berson purports to teach a system and method for issuing and validating tickets (see Abstract). However, Berson does not teach or suggest the elements of Applicant's independent claims. Specifically, Berson does not teach or suggest "receiving a ticket from a ticket holder" that includes "one or more customer security features, **wherein the customer security features identify a customer associated with the ticket**" (emphasis added). Rather, Berson is concerned with validating the ticket itself, not the ticket holder. Berson states that "preferably information T will include sufficient information to enable automatic **reconciliation of ticket 22** (col. 3, lines 63-65, emphasis added). Berson further goes on to state that "the

encrypted validating information preferably will include enough of the conventional information to allow **automated reconciliation of the ticket** when the ticket is scanned." (col. 4, lines 62-65, emphasis added).

A close reading of Berson finds absolutely no mention of customer security features that "identify a customer associated with the ticket" as taught and claimed by Applicant in amended, independent claims 1, 9, and 13. Although Berson does mention digital signatures, the digital signatures in Berson are not intended to "identify a customer associated with the ticket" as taught and claimed by Applicant. Berson states the following with regard to digital signatures:

Preferably field 22BC includes information T **which corresponds to at least a part of the conventional ticket information printed in field 22T**, and preferably information T will include sufficient information to enable **automatic reconciliation of ticket 22**, as will be described further below. Information T may either be fully encrypted or, preferably, may be digitally signed. As is well known to those skilled in the art information is digitally signed by extracting a portion of the information, such as a check sum, and encrypting the extracted information. The signed information is then validated by repeating the process and comparing the digital signatures. In an alternative embodiment of the invention field 22BC can contain only a signature of the conventional information in field 22T and **information to reconcile ticket 22** can be recovered by optical character recognition (OCR) techniques or an operator, if desired. (col. 3, line 61 through col. 4, line 9, emphasis added).

Berson is concerned with reconciliation of the physical ticket itself, and not with identifying the customer of the ticket. Berson uses either a digital signature or a signature of the ticket information to verify that the ticket itself is a valid, i.e. not forged, ticket. Berson reconciles the physical

ticket, but does not teach or suggest customer security features that identify a customer associated with the ticket, as taught and claimed by Applicant.

Because Berson does not teach or suggest customer security features that identify a customer associated with the ticket, Berson also does not teach or suggest "comparing the stored customer security features to the ticket holder and to the customer security features included on the ticket," or "accepting the ticket in response to the stored customer security features matching the ticket holder and the customer security features included on the ticket," as taught and claimed by Applicant in amended, independent claims 1 and 13 (and similarly, amended, independent claim 9). There is no disclosure in Berson of determining whether the ticket holder, i.e. the customer presenting the ticket, matches any customer security features. In the sections of Berson cited by the Examiner, i.e. col. 4, lines 10-18 and col. 5, lines 20-25, the barcode information is decrypted and compared to test information T in order to determine if the ticket is a valid ticket. Decrypted information T is compared to the information printed on the ticket in order to determine if the ticket has been forged, not in order to determine if the **ticket holder** himself or herself matches the customer security features. In Berson, if the physical ticket is validated, Berson then prints boarding passes, luggage checks, etc. (col. 5, lines 26-28), without any regard for whether or not the ticket holder matches any customer security features.

Berson is concerned with validating a physical ticket (col. 2, lines 3-17), and does not teach or suggest Applicant's claimed method, system, and computer program product for processing tickets that include customer security features that

identify a customer associated with a ticket. Therefore, Applicant respectfully submits that independent claims 1 and 13, and the claims which depend from them, are patentable over Berson.

**Claim Rejections - Alleged Obviousness Under 35 U.S.C. § 103**

Claims 4-6, 9-11, and 16-18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Berson in view of Sansone. Note that independent claims 1 and 13 have been amended to include the limitations previously found in dependent claims 4 and 16, respectively, and also to clarify that the stored customer security features are checked against both the ticket holder himself or herself, and the customer security features included on the ticket. Independent claim 9 has also been amended to make this clarification.

As discussed above, Berson does not teach or suggest key elements of Applicant's independent claims. Sansone does not overcome the deficiencies of Berson. Sansone purports to teach an electronic ticket containing "information about the personal computer that printed the ticket" (col. 1, line 66 through col. 2, line 1). Sansone discloses two bar code, bar code 20 and bar code 63 (col. 2, lines 34-49). Bar code 63 "represents the printer settings (printer manufacturer, model no., resolution, density, etc.) of the printer that printed ticket 11" (col. 2, lines 44-47). Bar code 20 "contains in coded form the name of the place of the event 17, the address of the event 18, and a unique number 19" (col. 2, lines 49-54). Sansone goes on to disclose that "[b]ar code 63 and number 64 may also be used to **validate the printer that prints ticket 11**" (col. 2, lines 52-54, emphasis added).

Sansone is concerned with preventing people from printing fraudulent tickets (col. 1, lines 25-27; col. 1, lines 38-50). Sansone does not teach or suggest tickets containing customer security features where "the customer security features identify a customer associated with the ticket" as taught and claimed by Applicant. Because Sansone does not teach or suggest customer security features that identify a customer associated with a ticket, Sansone can not teach or suggest "retrieving one or more stored customer security features corresponding to the ticket identifier in response to the scanning," "comparing the stored customer security features to the ticket holder and to the customer security features included on the ticket," or "accepting the ticket in response to the stored customer security features matching the ticket holder and the customer security features included on the ticket" as taught and claimed by Applicant in independent claims 1, 9, and 13

In the portions of Sansone cited by the Examiner, specifically column 7, lines 22-30, Sansone discloses determining whether the information from bar codes 63 and 20 is the same as the information stored in archive 66 (col. 7, lines 22-27). Sansone states that bar code 63 "represents the printer settings (printer manufacturer, model no., resolution, density, etc.) of the printer that printed ticket 11" (col. 2, lines 44-47). Sansone further defines bar code 20 as containing "in coded form the name of the place of the event 17, the address of the event 18, and a unique number 19" (col. 2, lines 49-54). Unique number 19 is defined to "represent a computer record" (col. 2, lines 40-41). Other than this reference to unique number 19, no further detail is given in Sansone regarding the use of unique number 19 or the computer record it purports to represent. Archive 66 is an image data archive (col. 3, lines

65-67; also see Sansone Figure 5) that stores images of issued tickets (col. 4, lines 5-7). Thus, Sansone discloses comparing the information in bar codes 63 and 20, i.e. the printer settings of the printer that printed the ticket and the name and address of the place of the event, to a stored image of the ticket in order to determine if the physical ticket is or is not a forgery. There is no teaching or suggestion in Sansone regarding determining whether "stored customer security features" match "the ticket holder and customer security features included on the ticket," where "customer security features identify a customer associated with a ticket" as taught and claimed by Applicant in independent claims 1, 9, and 13. In addition, the ticket shown in Figure 1 of Sansone does not show any "customer security features" that "identify a customer associated with a ticket." The ticket illustrated in Figure 1 of Sansone does not even include the customer's name, much less any features that would assist in identifying a customer associated with the ticket.

With regard to claims 5, 10, and 17, Sansone does not teach or suggest "sending a request to a security server, the request including a customer identifier **that uniquely identifies the customer of the ticket,**" as taught and claimed by Applicant. The Examiner cites item 20 in Sansone as being analogous to a customer identifier. However, as discussed above, Sansone defines item 20 as being a bar code (col. 2, line 41) that contains "in coded form the name of the place of the event 17, the address of the event 18, and a unique number 19" (col. 2, lines 49-54). Unique number 19 is defined to "represent a computer record" (col. 2, lines 40-41). Other than this reference to unique number 19, no further detail is given in Sansone regarding the use of unique number 19 or the computer

record it purports to represent. However, it is clear that nothing in bar code 20 has anything to do with "**a customer identifier that uniquely identifies the customer of the ticket**" as taught and claimed by Applicant.

With regard to claims 6, 11, and 18 Sansone does not teach or suggest "sending a merchant identifier to the security server, the merchant identifier uniquely identifying a merchant" as taught and claimed by Applicant. The Examiner cites the venue data in Sansone as being analogous to a merchant identifier, however, Applicant respectfully disagrees. Venue data would presumably include data regarding the name and location where an event is being held, but may not necessarily indicate who, i.e. which merchant, sold the ticket to a customer. Further, Sansone does not teach or suggest that "the receiving of the stored security features is performed in response to the merchant identifier being authorized by the security server" as taught and claimed by Applicant. The portion of Sansone cited by the Examiner, i.e. col. 7, lines 17-21, merely discuss sending information to a data center upon determining that a ticket is valid. There is no disclosure related to **authorizing a merchant identifier**.

Claims 7, 12, and 19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Berson and Sansone in view of Schneier. Applicant notes that Applicant is not relying solely on the use of a digital signature as the basis for patentability of Applicant's claims. Schneier does not overcome the deficiencies of Berson and Sanson.

For the reasons set forth above, Applicant respectfully submits that independent claims 1, 9, and 13, and the claims that depend from them are patentable, and respectfully request that they be allowed.



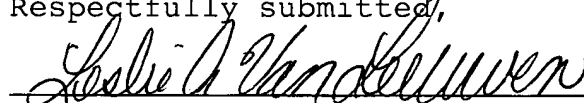
Conclusion

As a result of the foregoing, it is asserted by Applicant that the remaining claims in the Application are in condition for allowance, and Applicant respectfully requests an early allowance of such claims.

Applicant respectfully request that the Examiner contact the Applicant's attorney listed below if the Examiner believes that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

Respectfully submitted,

By



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